BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Truth-in-Billing	)	
and	)	CC Docket No. 98-170
Billing Format	)	
	)	
	)	

REPLY COMMENTS OF SBC COMMUNICATIONS INC.
TO MCI'S PETITION FOR RECONSIDERATION

I. Introduction

SBC Communications Inc.[1] (SBC) files this Reply to only three issues raised in MCI Worldcom's Petition for Reconsideration and Clarification filed on July 26, 1999.

Those three issues are: (1) MCI's attempt to dodge its obligations as a carrier by claiming that LEC billing and collection contracts are contracts of adhesion; (2) MCI's representation that a Third Party Administrator arrangement is a panacea that will solve all unauthorized conversion problems; and (3) MCI's argument that the Commission should regulate how ILECs recover the cost of billing system changes necessitated by the Truth-in-Billing requirements.

II. Competitive Billing Alternatives

MCI tries to depict ILEC billing and collection contracts as contracts of adhesion, arguing that there is a lack of competitive billing alternatives and the alleged "inability of

[1] SBC Communications Inc. is the parent company of various subsidiaries, including wireline telecommunications carriers. These subsidiaries include Southwestern Bell Telephone Company (SWBT), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company (SNET). The abbreviation "SBC" shall be used herein to include each of these subsidiaries as appropriate in the context.

large IXCs to present a credible threat of direct remit billing."[2] On that basis, MCI argues that the FCC should adopt rules absolving the IXC of liability for bill format issues for good faith efforts and instead impose liability on the ILEC.

However, AT&T, in its Petition for Reconsideration (AT&T's Petition), certainly appears to refute the claim that large IXC cannot present a credible threat of doing their own billing. On page four of AT&T's Petition, the statement is made that "AT&T uses more than a dozen billing systems to bill its business customers." Later, on page 5 of AT&T's Petition, AT&T estimates that it would cost over $4 million dollars and twelve months of development time to make the required changes to its billing systems to bring those systems into compliance with the Truth-in-Billing requirements. So, at least one IXC is not only able to do its own billing; it openly acknowledges that it is running a large scale billing operation for which Truth-in-Billing modifications would be costly.

As the Commission found in its detariffing order in 1986, there are also other alternatives to ILEC billing, such as credit card companies and other financial services companies. In fact, in the December/January timeframe of 1998/1999, MCI took back the lion's share of its Presubscribed Interexchange Carrier (PIC) billing that Southwestern Bell Telephone Company had been handling for MCI at the beginning of 1998. Competitive alternatives exist and MCI, like AT&T, is either issuing its own bills or using some of those other alternatives for a significant amount of the billing previously handled by Southwestern Bell Telephone Company.

MCI argues that carriers submitting casual call billing to ILECs should not be liable for violations of the Truth-in-Billing requirements because the LECs control the format of the casual billing bill pages. If MCI does not believe that an ILEC billing format meets the requirements of the Truth-in-Billing rules, MCI can try to negotiate a change in that format. However, if MCI and the ILEC cannot reach agreement then MCI

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[2] See *MCI Worldcom Inc. Petition for Reconsideration and Clarification*, page 7.

should consider other alternatives for its casual call billing business as discussed earlier. SBC is not going to purposefully require a format in violation of the Truth-in-Billing requirements, but there can be valid differences of opinion as to what is required by any set of rules. There is no legal basis for requiring an ILEC to indemnify MCI for its failure to meet its own independent obligation to comply with the Truth-in-Billing rules. ILECs cannot be required to provide legal advice to MCI; MCI will have to make its own legal analysis of the Truth-in-Billing requirements and its own assessment as to whether the format of the billing services offered by its billing entity is in compliance with those requirements and then act accordingly.

Truth-in-Billing requirements do not provide a basis for the FCC to re-regulate the competitive billing services market. While SBC companies do take the position that the carrier that provides the service is in the best position to describe the service in the first instance, that does not mean that the limitations in the existing billing contract are voided. ILEC billing contracts today contain certain limitations on the types of marketing messages that SBC will print on the bills and there is nothing in the Truth-in-Billing Order that would change those requirements. So long as MCI's service descriptions are within the character limitation of the billing system and are not otherwise in violation of the ILEC billing contract provisions, there should be no problem. Nor should there be any basis for shielding MCI from liability for its failure as a carrier to properly describe its services.

III. TPA Is Not the Answer

MCI represents to the Commission that the way to mitigate unauthorized conversions is the establishment of a third party administrator. The large IXCs have been supporting the establishment of such an entity to manage their responsibilities under the Slamming Rules. However, there is absolutely no factual explanation of how a TPA is going to prevent slamming, when all of the TPA activity occurs after the fact. As

currently proposed, the IXC TPA would be extremely costly and would delay customer refunds due as the result of slamming. Although a group of LECs met several times with the IXCs that were proposing the TPA, very little progress was actually made toward developing an industry supported TPA proposal because there is no concrete proposal as to how funding can be handled. SBC does not support the creation of a very expensive pseudo-agency to perform tasks that carriers can perform at less cost for themselves, with better service to end user customers.

IV. Billing System Development Costs

MCI requests that the Commission not allow ILECs to shift their portion of related billing system development costs to interexchange carriers through their billing and collection contracts. The purpose of FTA 96 was to move toward a more competitive telecommunications marketplace, not to re-regulate those aspects of telecommunications that have already been de-tariffed because the level of competition made regulation unnecessary. The marketplace, not the FCC, should determine how much, if any, of the cost of billing system modifications can be recovered through increased billing fees under the billing and collection contracts. Billing system modifications have been made in the past without the necessity of the FCC re-regulating the billing and collection process. There is simply no justification for using the billing modifications that will be required here as the trigger to reverse the march toward competition displacing regulation.

Respectfully Submitted,

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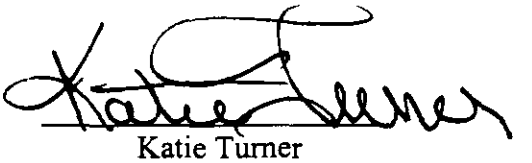
Certificate of Service

I, Katie Turner, hereby certify that the "Reply Comments of SBC Communications Inc. to MCI's Petition for Reconsideration" in CC Docket No. 98-170 has been served on September 14, 1999 to the Parties of Record.



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